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**From:** Matthew Todd [ToddM@api.org]  
**Sent:** 7/2/2018 4:22:41 PM  
**To:** Chapman, Apple [Chapman.Apple@epa.gov]  
**CC:** Bodine, Susan [bodine.susan@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]  
**Subject:** API Comments on EPA's New Owner Audit Program for Oil and Gas Production  
**Attachments:** 2018 07 02 API Comments on EPA New Owner Audit Program Final.pdf

Dear Ms. Chapman:

API respectfully submits the attached letter in response to the U.S. EPA's request for comments on its proposed changes to the 2000 policy titled "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations" for new owners of oil and natural gas exploration and production facilities and, in particular, the Agency's Draft Standard Audit Policy Agreement. API believes that the Audit Policy can be an important tool in furtherance of environmental compliance and hope this feedback will lead to a final program that provides a more flexible approach to eligibility and administration.

Please do not hesitate to contact me with any questions regarding the content of this submittal. We look forward to reviewing the revised draft agreement as discussed during the face-to-face meeting last Thursday, June 28<sup>th</sup>.

Regards,

Matt

Matthew Todd  
API  
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